

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

NO. 05-30023-MAP

UNITED STATES OF AMERICA)
)
)
V.)
)
WALTER T. MAY)
Defendant)

MOTION TO MODIFY TERMS AND CONDITIONS
OF DEFENDANT'S RELEASE

Now comes the defendant, Walter May, in the above-entitled matter and respectfully requests that this Honorable Court allow him to modify his terms of release and allow him to go for a CranioSacral therapy appointment with Verena Johanna Smith, at 19 Crosby Avenue, Amherst, MA on February 8, 2007 from 11:00 a.m. to 1:00 p.m., February 27, 2007 from 10:45 a.m. to 12:45 p.m., March 9, 2007 from 11:00 a.m. to 1:00 p.m. and March 16, 2007 from 11:00 a.m. to 1:00 p.m. A letter from Mr. May's neurologist, Dr. Michael Sorrell dated December 5, 2006 (previously filed) states that these weekly appointments are medically necessary. The defendant plans to leave his house at 9:45 a.m. and expects that he will be back at home by 2:00 p.m. on February 8, 2007, March 9, 2007 and March 16, 2007. The defendant plans to leave his house at 9:30 a.m. and expects that he will be back home by 1:45 p.m. for the February 27, 2007 appointment.

BY: /s/ Alan J. Black
Alan J. Black, Esq.
1383 Main Street
Springfield, MA 01103
413-732-5381
BBO# 553768

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to Todd Newhouse, AUSA and Karen Goodwin, AUSA on this on this 29th day of January 2007.

/s/ Alan J. Black